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01-RF-00843

Barbara A. Mazurowski
Manager
DOE, RFFO

SITE SAFETY IMPROVEMENT PLAN (SSIP) - AMP- 002-01

Ref: Barbara A. Mazurowski ltr. (01-00021) to Robert G. Card, Safety Concerns,
January 5, 2001

Dear Barbara:

The purpose of this letter is to provide a written update to RFFO on our recent safety progress and to transmit our Site Safety Improvement Plan (Attachment 1). Kaiser-Hill Company, L.L.C., (Kaiser-Hill) acknowledges the need and our responsibility to continually improve the safety of work activities of this complex closure project. This plan outlines the specific corrective actions that we are undertaking to address the deficiencies and concerns in your letter of January 5, 2001. In addition, the plan will be updated as necessary to incorporate other assessment data. For example, corrective actions from the EH review, ISM annual review and the appropriate site-wide actions identified in the 771 uptake corrective action plan will be added in the future. As the new Chief Operating Officer, I recognize my personal role in this process and my entire management team and I are committed to this ongoing effort and we are personally accountable for its effectiveness.

We have been actively developing and implementing initiatives to improve the safety performance since mid-January, while this overall plan was being developed. Initially, project operations that were demonstrating poor safety performance were stopped and remedies instituted to assure both Kaiser-Hill and the Rocky Flats Field Office that systems were in place to recommence work.

Other elements of the plan that have been started include reinforcing safety expectations and individual roles and responsibilities throughout the organization, augmenting and reorganizing the project's management and supervisory structure and Independent Safety Oversight organization, emphasizing the importance of high quality pre-evolutionary briefs, and revising the work planning process to more clearly identify hazards and implement controls for the work to be performed.

On an individual project basis it is important to note that key areas of improvement are also already underway.

- The 707 Project's Lessons Learned Program, senior supervisory watch and its Senior Management Review Board
- The 776 Project's Electrical Safety Work Requirements Program and its Beryllium Controls Pilot Program
- The 771 Project's radiological control and work control practice improvements
- The 371 Project's MC&A and IWCP improvements
- The Material Stewardship Project's improvements to waste procedures
- The RISS Project developed a construction foreman IWCP certification process

The plan is divided into five sections that correspond to the concerns expressed in your letter of January 5, 2001 and organizes the actions by their application. The sections are:

- 1) Management Performance**
- 2) Work Control and Planning Process**
- 3) Worker and Supervisor Performance**
- 4) Lessons Learned/Corrective Action to Prevent Recurrence**
- 5) Independent Safety Oversight**

Our strategy in developing the Site Safety Improvement Plan was to change our approach to closure from "focus on schedule" to focusing on the quality and safety of each daily work task and to reinforce our commitment to Integrated Safety Management (ISM) and its guiding principles (Attachment 2). The plan will be a "living document," which supports our continuing ISM commitment. Other elements of the strategy were to effect positive safety changes through leadership and commitment and to reinforce continuous improvement as an organization through the sharing of lessons learned across the site.

Most importantly our strategy is to focus initially on the few key safety basics that we believe have the greatest impact on performance. This will involve implementing near term actions, assessing their effectiveness and then moving on to other improvement areas. The five areas that we believe will have the most impact on safety performance are listed below. These areas are covered in more detail in the attached plan along with other improvements that are underway/planned. I firmly believe that if we are successful in addressing these areas, we will see a noticeable improvement in our site safety performance. The five areas are:

- 1. Changing the message being communicated to the workforce**

We are developing a strategy that emphasizes safe performance of the current evolution and de-emphasizes the discussion of the overall schedule. Constant reminders of the closure date targets may have supplanted the safety message to our workers. This is a key effort to refocus the workforce on safe performance of daily work. Our safety message needs to be reinforced daily by all levels of management; our actions must mirror our words.

2. **Improving the tools provided to support the first-line supervisors and line management in performing the work**

The critical position impacting safety performance on the site is the first-line supervisor. This plan implements numerous initiatives directed at providing the first-line supervisors with the tools they need to get the job done safely.

Our primary emphasis is enhanced training/mentoring and increased worker involvement in all phases of the work process. Additionally, we must support our first line supervisors with improved work packages and a stronger implementation of significant hazard identification and controls.

Additional support for the first-line supervisors is to significantly improve the quality of the work packages provided to the crews through improved work planning and upgraded procedures. This will be accomplished through a more streamlined and focused work control process that clearly identifies the critical hazards associated with the job and the established controls for the hazards. Enhanced training / mentoring and increased worker involvement in the planning process will also be key factors.

Additional tools to be provided to the first-line supervisors are real-time technical assistance for the work crews to resolve issues on the spot, streamlined requirements documents (revised ABs), and improved safety procedures for electrical isolation, beryllium controls, and lockout/tagout.

The first-line supervisors will also receive management skills training and the span of control for the supervisors has been evaluated and adjusted to ensure a balanced workload. Additionally, we have found and will continue to find ways to minimize the administrative burden on supervisors so that they will be able to spend the majority of their time with their work crews at the job site.

3. **Improving the pre-evolution briefings**

We recognize that the pre-evolution briefing is a key point in our work process. It is the focused time for each member of the work team and their supervision to ensure that:

- The task scope is understood, both what is in the task and what is not;
- The hazards and the controls to keep them all safe are understood;
- The expectation to stop if conditions change or if confusion exists is clear;
- Every member of the team knows their job and what to do as the task progresses.

4. Improving the corrective action and lessons learned processes

We recognize the need to improve the effectiveness of the corrective action process. The fact finding process for events has already been improved and efforts are underway to improve the effectiveness of corrective actions.

A revised lessons learned process is being developed to improve the quality and accessibility of lessons learned for the users. Additionally, a plan is under development for the establishment of site-wide centers of excellence for selected functions to promote best practices across the site. Kaiser-Hill will also take over responsibility for the operations review (now conducted by RFFO) in July 2001.

5. Improving the self assessment and independent oversight processes

In order to ensure that we understand our safety performance, a significant effort is planned to develop a strong self-assessment process and an improved Independent Safety Oversight function. The self-assessment program will strengthen line management's continual assessment of their project's performance and ensure the performance of their team meets the established expectations.

We commissioned an independent safety and management review by a team of recognized nuclear industry experts. This team has provided their evaluation and recommendations to the management team. We also established a Nuclear Safety Review Board, including independent nuclear industry experts, to provide continuing review and oversight of the closure project's performance. Their role will be to advise senior management of their assessment, our performance and identify areas needing improvement. Input from both of these efforts has been factored into the plan.

We are engaged in a partnering effort with the Rocky Flats Field Office to clearly define safety, how it will be measured and to establish safety goals for the site. Additionally, a process has been established for tracking and trending events to ensure management has clear picture of overall safety performance.

The Independent Safety Oversight group is being restructured to provide a broader base of more independent and objective assessment and the assessment process is being revised to conduct targeted assessments of key safety functions across the site.

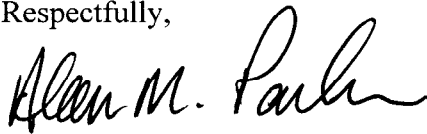
This plan will be revised as required to reflect current and future internal and external inputs. Revisions to the plan will be transmitted to RFFO and quarterly status reviews will be conducted to report progress and identify developing issues starting in July 2001. Many of the actions in this plan are continuing in nature but have a date for completion of the initial task. In our updates we will present the ongoing efforts intended to reinforce these key actions. I would also

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like to extend an offer to meet with you personally to discuss any aspect of this plan or its status at your request.

We look forward to our ongoing partnership with RFFO, especially in this critical area of worker and public safety. As your contractor, we fully recognize our safety responsibilities and the need for continuous improvement. We understand that we have a solemn obligation to our employees, the surrounding communities, the Department of Energy and the nation to pioneer a "world-class" closure-based safety program.

Respectfully,

A handwritten signature in black ink, appearing to read "Alan M. Parker". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Alan M. Parker
Executive Vice President and
Chief Operating Officer
Kaiser-Hill Company, L.L.C.

KPP:dlb

Attachments:
As Stated

Original and 1 cc - Barbara A. Mazurowski


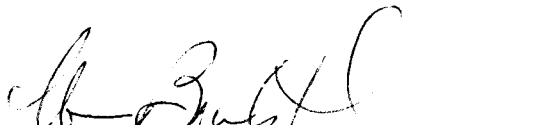


Site Safety Improvement Plan

Revision 6

April 16, 2001



Alan M. Parker, Executive Vice-President & COO


Ken Powers, 707 Project Manager
Mark Ferri, 776 Project Manager
Kelly Trice, 771 Project Manager
John Fulton, 371 Project Manager
Marvin Brailsford, Material Stewardship
Nancy Tuor, RISS
Len Martinez, Administration
Gregg Scott, General Counsel
Mark Spears, EES&QP

Kaiser-Hill Site Safety Improvement Plan

1) Management Performance

Issues	Actions	Deliverable	Responsible Manager	Due Date
-Lack of COO -Inconsistent communication/ message -Poor teamwork and integration -Inconsistent application of best practices -Lack of alignment on safety definition and performance measures -Inadequate self- assessment -Lack of formal protocol for safety priorities -Limited ISM description scope	a) <u>Improve executive management capacity.</u> Select a deputy and/or COO to organize and implement safety improvements and to improve integration and teamwork between the projects including consistent application of best practices.	Letter naming COO	Chairman of the Board	Complete
	b) <u>Achieve improved safety measurement understanding</u> Engage in a partnering process with DOE to achieve improved alignment:			
	- Establish joint Kaiser-Hill/RFFO team	Joint team established	Voorheis/Golan	Complete
	- Define safety	Safety definition	Voorheis/Golan	April 30
	- Establish performance indicators	Performance indicators	Powers /Golan	May 15
	- Establish goals	Goals established	Powers /Golan	May 30
	- Communicate safety definition, performance indicators, and goals to workforce	Communication plan	Powers /Golan	June 30
	- Establish a formal safety priority protocol	Formal Safety Protocol	Mazurowski/Parker	May 30
	c) <u>Improve management message including continuity and consistency.</u> Develop a strategy that puts the focus on safe performance of the work being done today and de-emphasizes schedule performance.	Communication strategy	Parker	May 30
	d) <u>Assess the effectiveness of the safety communication strategy</u>			
	- Perform baseline employee feedback survey	Survey results	Tuor	May 15
	- Perform safety improvement plan evaluation survey	Survey results	Tuor	December 31
	e) <u>Improve the self-assessment process.</u>			
	- Pilot an improved self-assessment process	Self-assessment pilot report	Trice	May 30
	- Implement self-assessment process	Project specific self-assessment plans	Project Managers	June 30
	- Evaluate MAP program and develop recommendations	Revised documentation program	Powers	June 30
	f) Evaluate utilization of Site resources in support of projects	Evaluation report with recommendations	Powers	September 15
	g) Expand the ISM description	Revised ISM manual	Powers/Jeffries	May 30

Kaiser-Hill Site Safety Improvement Plan

2) Work Control and Planning Process

Issues	Actions	Deliverable	Responsible Manager	Due Date
-Poor work planning -Scope creep -Inadequate hazard identification and implementation of controls -IWCP process does not provide a quality product -Inadequate planning capability -Difficult to use procedures -AB requirements not properly reflected in procedures -Unclear and confusing requirements (AB, Be, electrical, and LOTO)	a) Revise IWCP Process to simplify and clarify requirements and integrate requirements into the work document to achieve work packages that: <ul style="list-style-type: none"> Identify and focus on the most important and task unique safety issues, addressing all disciplines of safety Take appropriate credit for general skills and routine hazard mitigation Contain only significant hazards and appropriate controls Reduce complexity and increase quality 	DCF-7 Issued	Fulton	April 30
	<ul style="list-style-type: none"> Train and implement DCF-7 starting with prototype work package 	Implemented DCF-7	Project Managers	May 30
	b) <u>Improve planner performance</u>			
	<ul style="list-style-type: none"> Reevaluate and revise initial planner training requirements 	Planner training requirements issued	Fulton	April 30
	<ul style="list-style-type: none"> Complete development of revised initial planner training plans 	Training plans issued	Powers	May 30
	<ul style="list-style-type: none"> Analyze planner qualifications and work load and develop actions to correct deficiencies 	Planner training needs identified and resource needs identified	Project Managers	May 15
	<ul style="list-style-type: none"> Complete remedial training for existing planners 	Completed training rosters	Project Managers	July 31
	<ul style="list-style-type: none"> Develop a continuing training/mentoring program for planning team members 	Continuing training/mentoring program	Powers/PMs	June 30
	<ul style="list-style-type: none"> Ensure adequate planning resources 	Completed actions identified in work load analysis	Project Managers	June 30
	c) Develop and implement project specific expectations to ensure adequate involvement of workers and other planning team members in the planning process.	Written expectations	Powers /PMs	May 15
	d) Develop and implement project specific expectations for pre-evolution briefings including: <ul style="list-style-type: none"> Key controls and hazards Crew roles and responsibilities Significance of pre-evs as the final barrier to inadequate preparation (pre-game plan) 	Written expectations	Powers/PMs	May 15
	e) Develop and implement project specific expectations for post job review performance	Written expectations	Powers/PMs	May 15
	f) Perform a cross project effectiveness assessment to evaluate the quality of the work packages produced, use of post job review, and administrative completeness	Assessment Report	Spears/ PMs	November 30

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2) Work Control and Planning Process (Cont.)

Issues	Actions	Deliverable	Responsible Manager	Due Date
	g) <u>Improve procedure usability and accuracy</u> - Develop strategy for procedure evaluation and upgrade - Develop plan for procedure upgrades	Strategy paper Plan for procedure upgrades	Powers Project Managers	May 30 July 30
	h) Revise and submit 700 Bldg. D&D BIOs and Bldg. 440 FSAR	- 771 BIO - 440 FSAR - 707 BIO - 776 BIO	Trice Brailsford Ferri Ferri	Complete May 15 June 30 July 30
	i) <u>Complete the mapping of AB requirements.</u> Map requirements through all intermediate and referenced documents to implement procedures, check lists, etc. to ensure that field personnel will comply with the AB if they follow the procedures and that they fully understand and can implement the procedures - Perform pilot AB mapping verification for existing ABs in Bldg. 707 and 776 and in the Material Stewardship Bldgs. - Assess whether any further actions are required based on the results of the pilot activities	Documentation of completed AB mapping for new ABs Completed verification of AB mapping Documented decision on further mapping efforts	Project Managers Ferri/Brailsford Trice/Fulton	Upon imp. of new AB June 30 May 30
	j) Develop a plan to enhance site wide radiation controls to reflect the closure mission requirements of deactivation and decommissioning.	Radiological controls enhancement plan	Powers	May 30
	k) <u>Complete the Be program implementation.</u> - Complete the Be Pilot in B776, review it for overall safety effectiveness (looking at both Be safety and collateral safety impacts) - Issue revised Be standing order - Revise CBDPP - Implement BE program requirements - Revise Chapter 28	Be summit Issue revised Standing Order 74 Issue revised CBDPP Implemented Be program in each project Revised Chapter 28 submitted	Ferri Powers Powers Project Managers Powers	Complete April 30 April 30 June 30 June 30

Kaiser-Hill Site Safety Improvement Plan

2) Work Control and Planning Process (Cont.)

Issues	Actions	Deliverable	Responsible Manager	Due Date
	l) <u>Improve electrical safety implementation</u> <ul style="list-style-type: none"> - Develop new electrical safety requirements - Review new Chapter 36 requirements for construction applications - Develop D&D guidelines for electrical hazard mitigation - Develop project electrical safety plans for improved programmatic energy isolation (cold and dark) in D&D activities and improved work instructions and worker awareness and conservative precautions for work on actual or possible energized sources. 	New Chapter 36 requirements Documented review and proposed application D&D electrical guidelines Project electrical safety plans	Powers/Ferri Brailsford Trice Project Managers	April 30 April 30 April 30 May 30
	m) Complete development and implementation of revised guidance and procedures for LOTO as a result of lessons learned and worker feedback	Revised LOTO procedures implemented	Fulton/Powers	May 15
	n) Perform assessments of the adequacy of controls for significant safety hazards: fall protection, confined spaces, electrical safety, fire protection, hoisting and rigging, Be, and LOTO implementation	Completed assessments	Powers	December 31

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3) Worker and Supervisor Performance

Issues	Actions	Deliverable	Responsible Manager	Due Date
-Training and qualifications -Requirement non-compliance -Roles and responsibility -Formality and prescribed control of operations - Scope creep	a) <u>Review and correct span of control.</u> - Review first-line supervisors on Site to appropriately determine the span of control. - Make adjustments where the span of control exceeds supervisory capability	- Completed review of span of control with proposed actions - Identified actions from review completed	Project Managers Project Managers	Complete May 30
	b) <u>Improve focus on the work.</u> - Evaluate the administrative workload of first-line supervisors and identify opportunities to reduce - Implement actions identified	- Administrative work load evaluation - Implemented actions from evaluation	Project Managers Project Managers	Complete May 15
	c) <u>Improve first-line supervisor and line management skills.</u> Train first-line supervisors and line managers on change management, leadership and teamwork, communication and conflict resolution, conservative decision making, corrective action and fact finding process, safety, and contract and labor relations.	Training rosters with at least 80% of target attendees completing each class	Project Managers	August 16
	d) <u>Improve first-line supervisor safety alignment.</u> Establish increased interaction between senior management and first-line supervisors to align and reinforce safety expectations.	Plan describing interaction between project management and first-line supervisors	Project Managers	April 30
	e) <u>Provide technical support for the work crews.</u> - Provide Real-time Technical Assistance to deal with field changes in conditions or needed changes in requirements - Provide expectations for use by the work crews	- Implemented plan for providing real-time technical assistance for work crews - Expectations for use	Project Managers Project Managers	April 30 May 15
	f) Train managers and first-line supervisors on the new collective bargaining agreement and its allowance to simplify work and incent safety.	Completed training rosters with at least 80% completion	Project Managers	April 30
	g) Develop and present an education module for workers that clearly lays out our strategy and safety expectations for them, and their role and responsibility in safety	Completed training rosters with at least 80% completion	Project Managers	May 30
	h) Perform an assessment of the effects of the above actions on worker and first-line supervisor performance	Assessment report	Powers	September 30

Kaiser-Hill Site Safety Improvement Plan

5) Independent Safety Oversight

Issues	Actions	Deliverable	Responsible Manager	Due Date
<ul style="list-style-type: none"> - Ineffective safety oversight - Inadequate tracking and trending - Inadequate event/trend analysis - Readiness process not tailored to D&D 	a) <u>Form a Nuclear Safety Review Board.</u> <ul style="list-style-type: none"> - Assemble a team of recognized nuclear safety experts to review our nuclear licensing, compliance and processes to formalize our compliance approach and to identify and implement improvements. - Develop an on-going plan for board areas of focus 	<ul style="list-style-type: none"> - Nuclear Safety Review Board - On-going area of focus plan 	Spears Powers/Parker	Complete On-going
	b) <u>Conduct independent safety and management review.</u> Assemble a team of recognized nuclear industry experts to conduct a management-level assessment of project safety including contributing management and/or organizational issues.	Exit briefing	Spears	Complete
	c) Tracking and trending <ul style="list-style-type: none"> - Track and trend events by project/event category - Establish a process for developing action plans based on trends 	<ul style="list-style-type: none"> - Trending matrix - Action plan process 	Powers Powers	On-going June 30
	d) Modify monthly safety council to present roll-up of trends with analysis of data	Analysis report/presentation to senior management	Spears	Complete
	e) Restructure Independent Safety Oversight group to provide broader base of more independent and objective assessment	New organization in place	Spears	Complete
	f) <u>Improve the assessment process</u> <ul style="list-style-type: none"> - Develop an assessment plan for vertical and targeted assessments - Conduct "vertical" assessments of projects annually - Conduct targeted assessments 	Assessment plan Pilot "vertical" assessment Pilot targeted assessment	Powers Powers Powers	June 30 June 30 May 30

Kaiser-Hill Site Safety Improvement Plan

5) Independent Safety Oversight (Cont.)

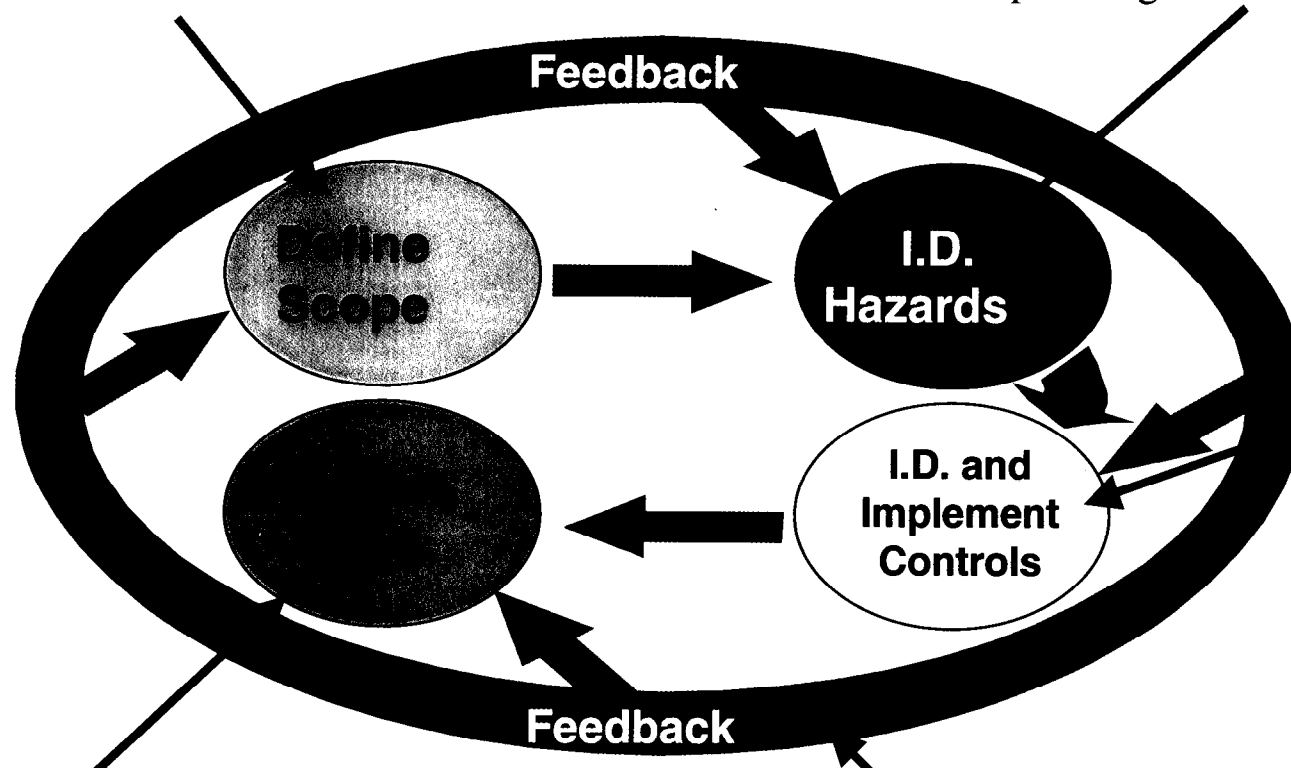
Issues	Actions	Deliverable	Responsible Manager	Due Date
	g) <u>Improve readiness assessment process</u>			
	- Establish joint Kaiser-Hill/RFFO evaluation team for the 425.1 Readiness Determination Process	- Establish Joint Evaluation Team	Mazurowski/Tiller	Complete
	- Perform pilot risk evaluation	- Presentation to senior Kaiser-Hill and RFFO managers	Miller/Sargent	Complete
	- Perform joint review of near term activities to determine required reviews	- Risk based readiness determination list	Miller/Sargent	July 30
	- Determine role of Joint Evaluation Team in activity review	- Joint agreement on role of JET	Miller/Sargent	July 30
	- Determine role of Joint Evaluation Team in the readiness assessment corrective action process	- Joint agreement on role of JET	Miller/Sargent	October 30

SSIP Integration with ISM

Attachment 2
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- Safety message is “focus on today”
 - Do your job right the first time, every time
- Improve planning team performance

Improve hazard and control identification through simplified JHA process (IWCP DCFM) and appropriate training/mentoring of planning teams



- Simplify procedures
- Improve supervisory and worker performance
- Improve 771 RadCon Program

- Improve pre-evolution briefings
- Improve support for first line supervisors
 - Span of Control
 - Tech Response Teams

- Improve self assessment, independent safety oversight
- Improve corrective actions/ follow-up and root cause determination